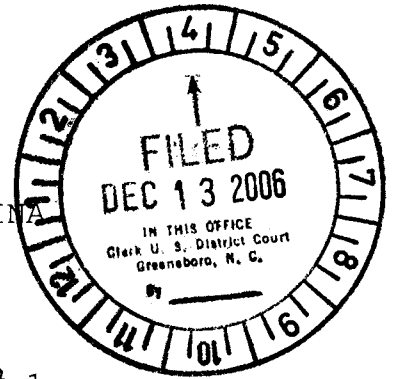


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA

v.

RICHARD NORMAN WILLIAMS

1:06CR 468-1

The United States Attorney charges:

COUNT ONE

On or about February 25, 2003, in the County of Guilford, in the Middle District of North Carolina, within the boundaries of the Guilford Courthouse National Military Park, an area within the special maritime and territorial jurisdiction of the United States, RICHARD NORMAN WILLIAMS, did knowingly engage in sexual acts, as defined in Title 18, United States Code, Section 2246(2)(B) and (C), with D.H., who was at that time twelve years of age, and at least four years younger than the defendant, in violation of Title 18, United States Code, Section 2243(a).

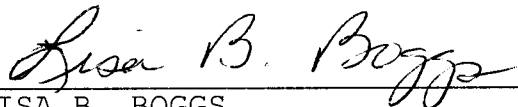
COUNT TWO

On or about August 5, 2003, in the County of Guilford, in the Middle District of North Carolina and elsewhere, RICHARD NORMAN WILLIAMS, did knowingly and intentionally, by means of a facility of interstate commerce, that is, by computer via the Internet, persuade, induce, entice, and coerce D.H., a person who had not attained the age of 18 years, to engage in sexual activity for which a person could be charged with a criminal offense under the

laws of the State of North Carolina, that is, first degree sexual offense, in violation of North Carolina General Statute 14-27.4; in violation of Title 18, United States Code, Section 2422(b).

COUNT THREE

Between July 23, 2004 and August 10, 2004, in the County of Guilford, in the Middle District of North Carolina and elsewhere, RICHARD NORMAN WILLIAMS, did knowingly use, persuade, induce, entice, and coerce a minor, that is, D.H., to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256, for the purpose of producing visual depictions of such conduct, knowing and having reasonable cause to know that such visual depictions would be transported in interstate commerce and such visual depictions were produced using materials that have been mailed, shipped and transported in interstate and foreign commerce; in violation of Title 18, United States Code, Section 2251(a).



LISA B. BOGGS
ASSISTANT UNITED STATES ATTORNEY



ANNA MILLS WAGONER
UNITED STATES ATTORNEY